



BellSouth Telecommunications, Inc.  
Suite 2101  
333 Commerce Street  
Nashville, Tennessee 37201-3300

615 214-6301  
Fax 615 214-7406

100 JAN 7 1999  
Guy M. Hicks  
General Counsel

EXECUTIVE SECRETARY

January 7, 2000

**VIA HAND DELIVERY**

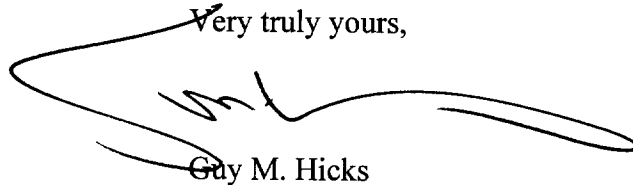
Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37245

Re: *Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996*  
Docket No. 99-00430

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Response to ITC^DeltaCom Communications, Inc.'s Motion for Leave to File Supplemental Brief. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH/jem

Enclosure

FILE

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

**IN RE:** *Petition by ITC^DeltaCom Communications, Inc. for Arbitration of Certain Unresolved Issues in Interconnection Agreement Negotiations Between ITC^DeltaCom and BellSouth Telecommunications, Inc.*

**Docket No. 99-00430**

RECEIVED  
REGULATORY AUTH.  
JAN 7 1999  
JAN 3 54  
EXECUTIVE SECRETARY

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE  
TO ITC^DELTACOM COMMUNICATIONS, INC.'S  
MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits its response to the motion of ITC^DeltaCom Communications, Inc. ("DeltaCom") for leave to file a supplemental brief in this proceeding. BellSouth has no objection to DeltaCom's motion provided that BellSouth be given the opportunity to file a supplemental brief as well. Had DeltaCom asked BellSouth to enter into a joint motion for leave to file supplemental briefs, BellSouth would gladly have done so, and the parties could have filed briefs at the same time. For whatever reason, DeltaCom elected not to contact BellSouth before filing its motion.

While DeltaCom's motion and supplemental brief addresses the Federal Communications Commission's Third Report and Order in Docket No. 98-147 and Fourth Report and Order in Docket 96-98, there have been other developments that have more of a "direct impact" on the issues in this case. (DeltaCom's Motion at 1). These developments include: (1) the FCC's recent Memorandum Opinion and Order in *In re: Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, CC Docket No. 99-295 (Dec. 22, 1999); (2) the Florida Public Service Commission's decision in the arbitration initiated by ICG Telecom Group, Inc., Docket No. 990691-TP; and (3) the Florida Commission's decision in the DeltaCom arbitration, Docket

**FILE**

No. 990750-TP, which is expected to be rendered on January 11, 2000. All of these decisions implicate at least some of the same issues that are pending in this proceeding. BellSouth believes that the Authority would benefit from supplemental briefing on these additional developments as well.

REC'D TN  
BELL SOUTH  
JAN 10 7 PM 3 5  
EXHIBIT SECRET

For the foregoing reasons, the Authority should grant DeltaCom's motion to file its supplemental brief and give BellSouth five (5) days to file a supplemental brief of its own.

Respectfully submitted this 1<sup>st</sup> day of January, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

By: 

Guy M. Hicks  
333 Commerce Street., Suite 2101  
Nashville, Tennessee 37201-3300  
(615) 214-6301

Thomas B. Alexander  
Bennett L. Ross  
675 West Peachtree Street, N.E.  
Suite 4300, BellSouth Center  
Atlanta, GA 30375-0001  
(404) 335-0750

CERTIFICATE OF SERVICE

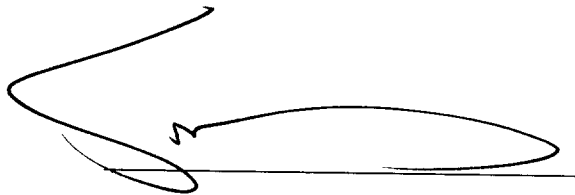
I hereby certify that on January 7, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

Gary Hotvedt, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

- ☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave. N, # 320  
Nashville, TN 37219-1823

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line.